

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

FERNANDO SUZARA, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

CROWN CASTLE USA INC., a
Pennsylvania corporation,

Defendant.

Case No.: 16-cv-0551

Judge Sara L. Ellis

UNOPPOSED MOTION TO EXTEND DISCOVERY DEADLINE

Plaintiff Fernando Suzara (“Plaintiff”), pursuant to Fed. R. Civ. P. 6(b), hereby respectfully moves the Court to enter an Order continuing the current discovery deadline by sixty (60) days. In support of the instant motion, Plaintiff states as follows:

1. On March 15, 2016, the Court entered a case schedule, ordering, among other things, that the Parties complete fact discovery by November 4, 2016. (*See* dkt. 16.)
2. Since the Court set the fact discovery deadline, the Parties have each propounded and responded to discovery, and Defendant Crown Castle USA Inc. (“Defendant”) is currently preparing to supplement its production, which it has represented should be complete later this month. The Parties are also working cooperatively through some discovery disputes that Plaintiff is hopeful will be resolved without Court intervention. Such efforts will likely result in the additional production of documents that will require further review.
3. Given the Parties’ continued and cooperative efforts to complete discovery and the upcoming deadline in this case, Plaintiff has consulted with Defendant and requested a brief sixty (60) day extension of the fact discovery cutoff, until January 3, 2017. Plaintiff is authorized to state that Defendant does not object to the requested extension.

4. This is the first request for an extension of the fact discovery deadline.

5. Based on the foregoing, good cause exists to grant the instant motion and the relief requested herein is not sought for any improper purpose.

WHEREFORE, Plaintiff Fernando Suzara respectfully requests that the Court enter an order (i) granting the instant motion, (ii) continuing the current fact discovery deadline to January 3, 2017, and (iii) awarding such other and further relief as the Court deems reasonable and just.

Respectfully submitted,

FERNANDO SUZARA, individually and on behalf of all others similarly situated,

Dated: October 13, 2016

By: /s/ Courtney C. Booth

One of Plaintiff's Attorneys

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CERTIFICATE OF SERVICE

I, Courtney C. Booth, an attorney, certify that on October 13, 2016, I served the above and foregoing by causing true and accurate copies of such paper to be filed and served on all counsel of record via the court's CM/ECF electronic filing system.

/s/ Courtney C. Booth